

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**RELIABLE ONE RESOURCES, INC.,
QUANTUM FILTRATION INC., CLYDE
CAMERON CRAVEY, KENNETH WIEDRICH,**

Defendants.

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CASE NO.: 6:23-cv-00006

**UNOPPOSED JOINT MOTION TO EXTEND ORDER, CONTINUE PRELIMINARY
INJUNCTION HEARING, AND EXTEND DATE FOR FILING OF SWORN
ACCOUNTING**

Defendants Clyde Cameron Cravey, and Kenneth Wiedrich (together “Defendants”) respectfully request that the Court extend the temporary restraining order, continue the related preliminary injunction hearing, and extend the date by which Defendants must file a sworn accounting in this case as follows:

I.

FACTS AND MOTION

On January 9, 2023 the Court granted the Securities and Exchange Commission’s (“SEC”) request for issuance of an *ex parte* temporary restraining order and asset freeze against Defendants in this case (“TRO”). The TRO remains in effect. Pursuant to the Court’s order, the TRO expires at 1 p.m. on Monday, January 23, 2023. The TRO further set the SEC’s motion for a preliminary injunction on Thursday, January 19, 2024. The Court also issued an Order of Ancillary Remedies on January 9, 2023, which, among other things, requires Defendants to file a sworn accounting with the Court by 5 p.m. on Monday, January 16, 2023.

Defendants have retained the undersigned as counsel, who are now in the process of investigating and analyzing the SEC's allegations. To permit sufficient time for that investigation, Defendants have conferred with the SEC regarding (1) extending the terms of the TRO, (2) continuing the Court's hearing on the Motion for Preliminary Injunction, and 3) extending the date by which the sworn accounting ordered in the Order of Ancillary Remedies must be filed.

After conferring with the SEC all parties agree to extend the terms of the TRO 7 days to January 30, 2023 at 1:00 p.m. Consistent with that agreed extension, Defendants request that the Court reset the hearing date for the SEC's Motion for a Preliminary Injunction to January 26, 2023. Defendants also request that this Court reset the dates for briefing on the Motion for Preliminary Injunction as follows:

1. Defendants shall have until January 23, 2023 at 1 p.m. to respond to the Motion.
2. Plaintiff shall file any reply by January 25, 2023 at 1 p.m.

Defendants also request the Court extend the deadline by which a sworn accounting must be filed with the Court to January 18, 2023 at 1 p.m.

II.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court (1) extend the terms of the TRO in this case to January 30, 2023 at 1:00 p.m., (2) continue hearing on the SEC's Motion for Preliminary Injunction to January 26, 2023, (3) reset briefing deadlines as agreed upon by the parties above, and (4) extend the deadline for Defendants to file sworn accountings pursuant to this Court's Order of Ancillary Remedies to January 18, 2023 at 1 p.m.

Dated: January 13, 2023

Respectfully Submitted,

/s/ David W. Klaudt

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**ATTORNEYS FOR DEFENDANT
KENNETH WIEDRICH**

CERTIFICATE OF CONFERENCE

I, David W. Klaudt, hereby certify that on the 13th day of January, 2023, I conferred with David B. Reece, counsel for Plaintiff in connection with the above Motion and he is unopposed.

/s/ David W. Klaudt

David W. Klaudt

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all parties that have appeared through the Court's electronic filing system on January 13th, 2023.

/s/ David W. Klaudt

David W. Klaudt